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May 7, 2024

**VIA CM/ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: *Atlantic Coast Life Ins. Co., et al. v. A.M. Best Rating Servs., Inc.***  
**Civ. A. No. 3:24-cv-05470 (ZNQ)(RLS)**

Dear Judge Singh:

This firm, together with MoloLamken LLP, represents the Plaintiffs in this action. We write with the consent of Defendant A.M. Best Rating Services, Inc. (“Defendant”) to respectfully request to respectfully request that the deadlines to file the redactions and Joint Motion to Seal the following be extended:

- Plaintiffs’ Confidential Complaint filed April 23, 2024 (DE No. 1);
- Plaintiffs’ Moving Brief in support of their Motion for Preliminary Injunction, Temporary Restraining Order, and Expedited Discovery (the “Motion”) filed April 23, 2024 (DE No. 6);
- Defendant’s Opposition to Plaintiff’s Motion and Declaration of Michael Porcelli filed April 29, 2024 (DE No. 16);
- Plaintiffs’ Reply in further Declaration in further support of their Motion, including the Declaration of Kenneth King with Exhibits A-D, and Declaration of Charles R. Lundelius, Jr. filed May 1, 2024 (DE No. 21);
- Defendant’s May 6, 2024 letter, with exhibits annexed thereto (DE No. 29); and
- Plaintiffs’ May 6, 2024 letter (DE No. 30).

The parties respectfully request permission to file one Omnibus Joint Motion to Seal, as to the above referenced materials, on or before May 20, 2024. Counsel for Defendant has consented to this request. If the requested extension is acceptable to Your Honor, we respectfully request that Your Honor “So Order” the letter and have it entered in the docket.

Hon. Rukhsanah L. Singh, U.S.M.J.

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As always, we thank the Court for its attention to this matter, and remain available should Your Honor or Your Honor's staff require anything further.

Respectfully submitted,

*s/Liza M. Walsh*

Liza M. Walsh

cc: all counsel of record (via ECF & Email)

**SO ORDERED this \_\_\_\_ day of May, 2024.**

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**Hon. Rukhsanah L. Singh, U.S.M.J.**